

REMARKS**Status of Claims**

The Office Action mailed March 24, 2005 has been reviewed and the comments of the Patent and Trademark Office have been considered. Claims 1-73 were pending in the application. Claims 1, 13, 27, 28, 33-39, 49, 58, 64, and 66-72 have been amended, claims 6-9, 15-18, 26, 29-32, 40-43, 50, 59, 65, and 73 have been cancelled without prejudice or disclaimer and no new claims have been added. Therefore, claims 1-5, 10-14, 19-25, 27, 28, 33-39, 44-49, 51-58, 60-64, and 66-72 are pending in the application and are submitted for reconsideration.

This amendment changes and deletes claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, are presented, with an appropriate defined status identifier.

Specification

In paragraph 4, the specification is objected to as failing to provide proper antecedent basis for the claimed subject matter. The applicants have amended the claims to address these objections. Applicants note that "computer program product" is a term of art in claim drafting and has been approved by the Federal Circuit in several cases including *In re Beauregard*, 53 F.3d. 583 (Fed. Cir. 1993).

Rejection Under § 101

Claims 13-38 and 58-73 are rejected under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter. Applicants have amended these claims to recite either program code on a computer readable medium or an apparatus (system) which meet the requirements of 35 U.S.C. §101. See, e.g., *In re Beauregard*. Accordingly, applicants submit that this rejection has been overcome and should be withdrawn.

Prior Art Rejections

In the Office Action, claims 1, 6-13, 15-18, 23-27, 29-32, 36-38, 49, 50, 55-59, 64, 65, and 70-73 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application publication No. 2002/0099735 to Shroeder et al. (hereafter “Shroeder”). Claims 2-5, 14, 19-22, 28, 33-35, 39-48, 51-54, 60-63, and 66-69 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Shroeder in view of U.S. Patent 6,418,400 to Webber (hereafter “Webber”). Applicants respectfully traverse these rejections for at least the following reasons.

Each of the independent claims 1, 13, 27, and 39 recite a method, system, or software that, *inter alia*, (1) receives a standard data model, by a trading partner, comprising EDI related data for a plurality of transactions, (2) generates data definitions for a self-describing markup language which includes, for each transaction, (a) data definition for the self-describing markup language, (b) a separate data model to read in data, (c) a separate data model to read out data, and (d) a map component file; and (3) automatically generating, by the trading partner, an EDI document based on the self describing mark up language data. These recited features are not disclosed or suggested by the applied prior art.

The Office Action cites to paragraph [0051] of Shroeder for disclosing the claimed features 2(a)-2(d) above. However, this portion of Shroeder only discloses the use of a super map 402 for all possible data segments and data types for a given type of document. In contrast, the claimed features require that, for each transaction in standard data model (of the trading partner), a separate data model to read in data is created (for example, a Source XML model), a separate data model to read out data (for example, a Target EDI model), and a map component file. That is, Shroeder does not disclose the features recited in these independent claims. Rather Shroeder discloses a generic super map for a transaction type that is not generated from the standard data model (of the trading partner) and nor does Shroeder disclose the specific components 2(a)-(d) recited in the pending independent claims.

The independent claims 49, 58, and 64 recite a method, system, and software that process inbound EDI documents to generate data in a self describing data format from the received EDI documents. These claims also require for each transaction in a standard data model (of the trading partner), a separate data model to read in data is created (for example, a

Source EDI model), a separate data model to read out data (for example, a Target XML model), and a map component file. These data models allow for the automated generation of the self-describing markup language data and are also not disclosed or suggested by Shroeder.

Since the deficiencies of Shroeder are not cured by any of the other applied references, the Office Action fails to make a *prima facie* case of obviousness as required by 35 U.S.C. §103. Accordingly, the pending independent claims are patentable over the applied prior art.

The dependent claims are also in condition for allowance for at least the same reasons, as discussed above, as the independent claims on which they ultimately depend. In addition, they recite additional patentable features when considered as a whole.

For example, the dependent claims 2-5 disclose receiving user input of one or more of an EDI standard, a version of standard, or a transaction set which allows for the claimed data models to be customized. No such customized data models (for read in and read out data) are taught or suggested by Shroeder. In fact, Shroeder's super map teaches away from this customization by teaching a super map that includes all the data segments and elements for a particular transaction. Furthermore, the cited figure 3 of Webber simply discloses a spreadsheet display but does not disclose the claimed user input of an EDI standard, a version of the standard, or a transaction set which allows for the claimed data models to be customized (and furthermore, the claimed data models are not disclosed either). Accordingly, these recited features provide additional reasons for the patentability of these claims.

Conclusion

In view of the foregoing amendments and remarks, applicants respectfully submit that the application is now in condition for allowance. If there are any questions regarding the application, or if an examiner's amendment would facilitate the allowance of one or more of the claims, the examiner is invited to contact the undersigned attorney at the local telephone number below.

Should additional fees be necessary in connection with the filing of this paper, or if a petition for extension of time is required for timely acceptance of same, the Commissioner is hereby authorized to charge deposit account No. 19-0741 for any such fees; and applicants hereby petition for any needed extension of time.

Respectfully submitted,

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